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Attorneys for Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MICHAEL JAMES PRATT,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:23-cv-02361-AC

STIPULATION AND ~~PROPOSED~~ ORDER  
FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, with this Court's approval, to extend the time by 14 days, from February 16, 2024 to March 1, 2024, for Defendant to file his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

This is Defendant's first request for an extension of time. Plaintiff's counsel does not oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists for the requested extension. Due to ongoing staffing fluctuations and organizational changes, the

undersigned counsel for the Commissioner has been tasked with additional duties including serving as a jurisdictional coordinator, reviewing other attorneys' work, training and mentoring new attorneys, and handling more cases, with responsibility for over 40 cases pending in District Court and the Ninth Circuit. As a result, and despite diligent efforts to comply with this Court's Scheduling Order, counsel for the Commissioner needs a short extension in the instant case to review the administrative record, consider the issues that Plaintiff has raised, confer with his client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: February 13, 2024

LAW OFFICES OF FRANCESCO BENAVIDES

By: /s/ Francesco Benavides\*  
FRANCESCO BENAVIDES  
Attorney for Plaintiff  
[\*as authorized by email on Feb. 13, 2024]

Dated: February 13, 2024

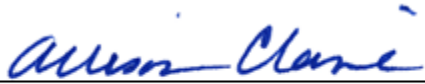
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By: /s/ Margaret Branick-Abilla  
MARGARET BRANICK-ABILLA  
Special Assistant United States Attorney  
Attorneys for Defendant

**ORDER**

Pursuant to the parties' stipulation, IT IS ORDERED that Defendant shall have an extension, up to and including March 1, 2024, to submit his Cross-Motion for Summary Judgment. Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

DATED: February 13, 2024

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE